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		DICTRICT COLIDT					
15	UNITED STATES DISTRICT COURT						
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16	NORTHERN DISTR	ICT OF CALIFORNIA					
16 17		ICT OF CALIFORNIA SCO DIVISION					
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17 18	SAN FRANCI	Case No. 3:17-cv-06748-WHO DEFENDANT'S DESIGNATIONS OF					
17 18 19	OWEN DIAZ,	Case No. 3:17-cv-06748-WHO					
17 18 19 20	SAN FRANCI OWEN DIAZ, Plaintiff,	Case No. 3:17-cv-06748-WHO DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY Trial Date: March 27, 2023					
17 18 19 20 21	OWEN DIAZ, Plaintiff, v.	Case No. 3:17-cv-06748-WHO DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY					
117 118 119 220 221 222	OWEN DIAZ, Plaintiff, v. TESLA, INC. DBA TESLA MOTORS, INC.,	Case No. 3:17-cv-06748-WHO DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY Trial Date: March 27, 2023					
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17 18 19 20 21 22 23 24 25	OWEN DIAZ, Plaintiff, v. TESLA, INC. DBA TESLA MOTORS, INC.,	Case No. 3:17-cv-06748-WHO DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY Trial Date: March 27, 2023					

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<u>DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY</u>

Defendant respectfully submits the following chart identifying deposition testimony designated for the above referenced witness:

# Lines Deposition Excerpt Objection/Counterdesignation 1	- 11				
13	4	#	Lines	Deposition Excerpt	Objection/Counterdesignation
11 document marked at the bottom as Tesla 156. 12 Is this a copy of your resume? 13 A. Yes. 2 40:23 - 41:3 23 Q. Did you submit this as part of your application 14 to work at West Valley in or around August of 2015? 25 A. Yes. 1 Q. Did you submit this as part of your application 2 to work at Tesla in or around August of 2015? 3 A. Yes. 150:15 151:20 15 Q. In paragraph 14 you state "In approximately 16 August of 2015, Demetric's father, Owen, informed him 17 West Valley had openings for positions at the Tesla 18 factory." 19 Did your father tell you that West Valley had 20 openings? 21 A. Yes. 22 Q. Did your father encourage you to apply? 23 A. Yes. 24 Q. What did your father tell you about what it was 25 like to work at Tesla? 151: 1 A. He told me it was going to be a good experience 2 and that it would be good. I 3 bought into it because I thought it was 25 like into it work in approximately 25 like into it work in approximately 26 like into it work in approximately 27 like i	5	1			
Tesla 156. 12 Is this a copy of your resume? 13 A. Yes. 2 40:23 41:3 23 Q. Did you submit this as part of your application 14 to work at West Valley in or around August of 2015? 25 A. Yes. 1 Q. Did you submit this as part of your application 2 to work at Tesla in or around August of 2015? 3 A. Yes. 150: 150: 151: 20 15 Q. In paragraph 14 you state "In approximately 16 August of 2015, Demetric's father, Owen, informed him 17 West Valley had openings for positions at the Tesla 18 factory." 19 Did your father tell you that West Valley had 20 openings? 21 A. Yes. 22 Q. Did your father encourage you to apply? 23 A. Yes. 24 Q. What did your father tell you about what it was 25 like to work at Tesla? 151:	6				
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40:23 – 41:3					
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3 bought into it because I thought it was					
28 going to be the				ϵ	
	28			going to be the	

Case No. 3:17-cv-06748-WHO

1	4 ultimate experience. Like, oh, I get to		
2	work for Tesla.		
	5 They're making modern productions to		
3 4 5	build electrical		
	6 cars to make the world a better place.		
	Like, why		
	7 wouldn't I want to be a part of that?		
	8 Q. Your father told you it was going to		
6	be a good		
	9 experience to work at Tesla?		
7	10 A. Yeah. He told me it would be a		
	good experience		
8	11 and it was going to be good for me.		
9	12 Q. And that was right before you		
	applied in August 13 of 2015?		
10	13 of 2013? 14 A. Yes.		
	15 Q. Did your father tell you around the		
11	time you		
10	16 applied in August 2015 anything		
12	about what his work		
13	17 experience was like at Tesla?		
14	18 A. When I was applying there, he said		
	that his work		
15	19 experience was going okay. From		
	what I could tell, it		
16	20 was going good.		
17			

Case No. 3:17-cv-06748-WHO

1	DATED: February 13, 2023	QUINN EMANUEL URQUHART &
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		-3- Case No. 3:17-cv-06748-WHO

DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY